

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**REX VENTURES GROUP, LLC d/b/a
ZEEKREWARDS.COM, and PAUL
BURKS,**

Defendants.

Civil Action No. 3:12-cv-519

**RECEIVER'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF ITS MOTION FOR ORDER DIRECTING BBVA COMPASS BANK TO
TURNOVER ESTATE ASSETS AND ALTERNATIVE MOTION FOR ORDER
DIRECTING BBVA COMPASS TO APPEAR AND SHOW CAUSE WHY IT SHOULD
NOT BE HELD IN CONTEMPT FOR VIOLATION OF FREEZE ORDER**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Kenneth D. Bell, Court-appointed Receiver (the "Receiver") of Rex Venture Group, LLC d/b/a ZeekRewards.com, moves for an extension of time to file its Reply in Support of its Motion for Order Directing BBVA Compass Bank to Turnover Estate Assets and Alternative Motion for Order Directing BBVA Compass to Appear and Show Cause Why it Should not be Held in Contempt for Violation of Freeze Order ("Reply"). The Receiver's Reply is currently due Thursday, July 2, 2015. Plaintiff seeks an extension through Tuesday, July 14, 2015 to file and serve its Reply.

In support of its motion, the Receiver shows the Court the following:

1. The Receiver's time to file its Reply has not expired.

2. This motion is made in good faith and not for delay.
3. BBVA Compass Bank consents to the relief requested in this motion.
4. The parties have resumed settlement discussions.

WHEREFORE, the Receiver requests an Order for extension of time through and including Tuesday, July 14, 2015 to file and serve its Reply.

This the 2nd day of July, 2015.

/s/Joseph W. Moss, Jr.

Joseph W. Moss, Jr.

N.C. Bar No. 20236

Matthew M. Holtgrewe

N.C. Bar No. 42912

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Attorneys for KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing motion was filed using the CM/ECF system which will send electronic copies to counsel of record registered to receive electronic service.

This the 2nd day of July, 2015.

/s/Joseph W. Moss, Jr.
Joseph W. Moss, Jr.